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UNITED STATES DISTRICT COURT, ELECTRONICALLY FILED  
SOUTHERN DISTRICT OF NEW YORK

DOC #: 2-11-19

DATE FILED: 2-11-19

H. CRISTINA CHEN-OSTER; SHANNA  
ORLICH; ALLISON GAMBA; and MARY  
DE LUIS, on behalf of themselves and all  
others similarly situated,

No. 10-CV-6950-AT-RWL

Plaintiffs,

-against-

GOLDMAN, SACHS & CO. and THE  
GOLDMAN SACHS GROUP, INC.,

Defendants.

**JOINT STIPULATION AND ~~PROPOSED~~ ORDER**

**WHEREAS**, Defendants previously produced PeopleSoft database files, including employee ID numbers, for certain employees of Goldman, Sachs & Co. LLC (“Goldman Sachs”) (the “Employee Data”);

**WHEREAS**, Plaintiffs have sought to obtain “employee name” field data for “each and every employee ID number included in all PeopleSoft database files produced during the litigation,” including male employees of Goldman Sachs (the “Employee Name Field”);

**WHEREAS**, Defendants previously produced the Employee Name Field for female Associates and Vice Presidents;

**WHEREAS**, Goldman Sachs produced the Employee Data as Attorneys’ Eyes Only under the Protective Order and Confidentiality Agreement governing this matter (ECF No. 51) (the “Protective Order”);

**WHEREAS**, the parties met and conferred and reached agreement that, without conceding the relevance of the requested data, Defendants will produce the Employee Name Field Plaintiffs seek subject to additional privacy protections set forth below.

**IT IS HEREBY STIPULATED, AGREED AND ORDERED** as follows:

1. The parties agree that the Employee Data is designated and will continue to be treated as Attorneys' Eyes Only under the Protective Order, and that Goldman Sachs' production of the Employee Name Field also will be designated and treated as Attorneys' Eyes Only under the Protective Order.
2. The parties agree to redact and/or use employee ID numbers in lieu of names in documents filed publicly with the Court referencing the Employee Data where an individual's name or an individual's Employee Data is identified, subject to Paragraph 4 below.
3. The parties agree to redact any Employee Data, including the Employee Name Field where relevant, included in any document filed with the Court. Plaintiffs agree not to seek to unseal any such information, and not to oppose any request by Defendants to keep this information redacted in any document filed with the Court, subject to Paragraph 4 below.
4. The parties reserve all rights as to the use at trial of employee names, the Employee Data, or the Employee Name Field produced pursuant to this Stipulation.
5. Defendants will produce to Plaintiffs the Employee Name Field (together with Unique Employee IDs to connect the two datasets) within five (5) business days of the execution of this Stipulation.

Dated: February 8, 2019

By: /s/ Ann-Elizabeth Ostrager

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**SO ORDERED:**

By:   
HON. ROBERT W. LEHRBURGER

Dated: New York, New York  
February 11, 2019

By: /s/ Kelly M. Dermody

*Attorneys for Plaintiffs and the Certified Class*

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